



May 6, 2013

Michigan Senate Committee on Natural Resources, Environment, and the Great Lakes

RE: Senate Bill 266 – Reducing Michigan Ballast Water Protections

Dear Senators:

Tip of the Mitt Watershed Council, on behalf of its 2,500 plus members, wishes to extend our concern with regards to Senate Bill 266. SB 266 would weaken Michigan's ballast water program by allowing ballast water exchange to automatically fulfill permit requirements. This bill would increase the risk of introduction of aquatic invasive species jeopardizing our economy, environment, and public health.

Nearly all of Michigan's waterways have suffered substantial environmental impacts over time. This is especially true when you consider the impact of invasive species upon the Great Lakes. Invasive species such as round gobies, zebra and quagga mussels, sea lamprey, and ruffe have taken over Great Lakes ecosystems not only at the expense of native species, but also to the expense of Great Lakes residents and businesses as well.

Since the 1800s, more than 185 alien species have invaded the Great Lakes ecosystem from around the world, costing us millions, and in some cases, irreparably damaging the Great Lakes ecosystem. Ship ballast is the primary pathway for the introduction and spread of aquatic invasive species, which cause tremendous damage in their new homes by feeding on, and out-competing native species, fouling beaches, degrading fisheries, clogging water intake pipes and other infrastructure, disrupting the food chain, and contaminating drinking water. More than one-third of these organisms have been introduced in the past 30 years - since the St. Lawrence Seaway opened up.

The negative economic impact of invasive species is in the billions of dollars and once they are introduced into the Great Lakes ecosystem, controlling them is a losing battle. Invasive species adversely affect many commercial, agricultural, aquacultural, and recreational activities that rely heavily on a strong and stable ecosystem. Economic losses in the Great Lakes Basin from aquatic invasive species were estimated to exceed \$5.7 billion per year, according to a Cornell University Study. Additionally, the costs incurred by the state, local municipalities, and businesses to respond to the introduction of an aquatic invasive species is quite significant. Damage estimate from zebra mussels alone exceed \$3 billion over the past ten years. Furthermore, studies have estimated lost property values on infested water bodies of up to \$12,000 per property.

Senate Bill 266 would interfere with the state regulatory processes already underway by eliminating an important tool now being used to address invasive species pollution in ship ballast. Michigan's Ballast Water Control General Permit, the first of its kind in the nation, requires ongoing vessels to treat their ballast water prior to entering Michigan ports to prevent aquatic invasive species from being introduced into the Great Lakes. Michigan has taken action using scientifically sound methods under the Clean Water Act's existing authority to set standards to control the largest known source of new invasions. Since Michigan first took action years ago, significant progress has been made in addressing the risk of introduction and spread of invasive species through ship ballast.

Both the U.S. Coast Guard and U.S. Environmental Protection Agency (EPA) have taken steps to strengthen federal standards in an effort to prevent further economic and ecological harm from additional introduction and spread of invasive species in the Great Lakes from ship ballast. It is worthwhile to note that both of these agencies moved to a new, stricter standard that "will result in a substantial reduction in the concentration of living organisms in the vast majority of ballast water discharges, compared to discharges of ballast water managed by mid-ocean exchange." Additionally, EPA has included additional requirements for vessels in the Great Lakes. Ballast water exchange, **in combination with treatment**, is required to provide additional protections because EPA recognized that the Great Lakes are a unique and valuable resource and have been particularly impacted by the introduction of invasive species.

Ballast water exchange regulations alone, as proposed in SB 266, are not enough to protect the Great Lakes and Michigan waters from all aquatic invaders. Saltwater flushing is not a substitute for ballast water treatment; flushing does not remove all aquatic species from ballast tanks. Therefore, SB 266 increases the risk of introduction of aquatic invasive species. The risk is not worth the gain. With less than 2% of Michigan's port traffic from overseas, we would be risking the health of the Great Lakes and Michigan's public health and economy to ease restrictions on about five or six vessels, according to DEQ estimates.

While scientists throughout the region agree that invasive species are one of the greatest threats to the Great Lakes, you do not have to be a scientist to recognize the damage these invaders inflict on our fisheries, economy, and human health. A strong standard that will eliminate the threat of invasive species from ballast water is needed. If we are going to maintain the proud heritage of the Great Lakes, we must remain vigilant in our efforts to protect against aquatic invasive species. We hope you will see that SB 266 is not necessary and can have significant consequences for Michigan's economy and oppose SB 266.

Thank you again for the opportunity to comment. If you have any comments about the comments provided, please feel free to contact me at [jenniferm@watershedcouncil.org](mailto:jenniferm@watershedcouncil.org) or 231-347-1181.

Sincerely,



Jennifer McKay  
Policy Specialist